

**SILLS CUMMIS & GROSS P.C.**

S. Jason Teele, Esq. (steele@sillscummis.com)  
Daniel J. Harris, Esq. (dharris@sillscummis.com)  
Gregory A. Kopacz, Esq. (gkopacz@sillscummis.com)  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 643-7000 (Telephone)  
(973) 643-6500 (Facsimile)

*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT  
ADVISORS, LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-14539 (JKS)

(Jointly Administered)

**Hearing Date: August 23, 2022 at 10:00 a.m. (ET)**

**NOTICE OF PROPOSED ORDER IN AID OF ORDER AUTHORIZING THE PRIVATE  
SALE OF CERTAIN PROPERTIES FREE AND CLEAR OF LIENS, CLAIMS,  
ENCUMBRANCES AND INTERESTS**

**PLEASE TAKE NOTICE** that on June 21, 2022, the Court entered an order granting the Motion (the “**Sale Order**”) [Docket No. 62]. Paragraph 11 of the Sale Order requires that “[a]ll proceeds from the sales – including, for the avoidance of doubt, any applicable broker/sales commissions owed or to be paid in connection with the sales to the Purchasers – shall be held in escrow by the Debtors pending further order of this Court.”

**PLEASE TAKE FURTHER NOTICE** that since the entry of the Sale Order, two brokers representing purchasers of properties authorized to be sold filed motions to allow the payment of their commissions at closing. *See* Docket Nos. 190, 254. One such motion is set for hearing on August 23, 2022. *See* Docket No. 254, 293.

**PLEASE TAKE FURTHER NOTICE** that in the ordinary course of closing the sale transactions specified in the Sale Order, the parties’ representatives will prepare settlement statements listing all charges and credits to the buyer and to the seller. The settlement statement

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors’ service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

may require the Debtors to pay charges including, but not limited to water, sewer, electrical, condominium fee assessments, brokers' commissions, and real property taxes, from the proceeds.

**PLEASE TAKE FURTHER NOTICE** that, in light of the foregoing, attached hereto as **Exhibit A** is a proposed *Order in Aid of Order Authorizing the Private Sale of Certain Properties Free and Clear of Liens, Claims, Encumbrances and Interests* (the "**Proposed Order**").

**PLEASE TAKE FURTHER NOTICE** that the Debtors will present the Proposed Order to the Court at the hearing to be held on August 23, 2022.

Dated: August 19, 2022

**SILLS CUMMIS & GROSS P.C.**

/s/ S. Jason Teele  
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